

## **Safety and Environmental Management Systems (SEMS) Potential Incident of Noncompliance List**

### **GENERAL**

- S-100**                    **HAS A SEMS PROGRAM BEEN DEVELOPED, IMPLEMENTED, AND MAINTAINED IN ACCORDANCE WITH API RP 75?**  
**Authority:** 30 CFR 250.1900                    **Enforcement Actions:** W/S  
**INSPECTION PROCEDURE:**  
Physically review lessee's SEMS program and verify that all thirteen elements are addressed, implemented and maintained for each facility under BSEE jurisdiction.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if all elements described in 250.1902 are not addressed.  
Issue one facility shut-in (S) INC for an inspection of a lessee's SEMS program if the lessee has failed to develop, implement, and maintain a SEMS program.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-101**                    **HAS FORM BSEE-131, AS REQUIRED IN 250.1929, BEEN SUBMITTED TO BSEE ON AN ANNUAL BASIS BEGINNING MARCH 31, 2011?**  
**Authority:** 30 CFR 250. 1900(a)                    **Enforcement Action:** W  
                  30 CFR 250. 1900(b)  
                  30 CFR 250. 1929  
**INSPECTION PROCEDURE:**  
Verify that form BSEE-0131 has been submitted and that the lessee has documentation of the form being submitted.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has no documentation of form BSEE-0131 being submitted annually as required.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-102**                    **HAS MANAGEMENT ENSURED THAT GOALS AND PERFORMANCE MEASURES ARE ESTABLISHED FOR THEIR SEMS PROGRAM?**  
**Authority:** 30 CFR 250. 1909(a)                    **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that management has a written program that provides leadership in establishing goals and performance measures, demands accountability for implementation, and provides necessary resources for carrying out an effective program.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has no program in place to establish goals and performance measures.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.

## **SAFETY AND ENVIRONMENTAL INFORMATION**

### **SAFETY**

**S-200**

**DOES THE SEMS PROGRAM REQUIRE THAT A COMPILATION OF SAFETY AND ENVIRONMENTAL INFORMATION BE DEVELOPED AND MAINTAINED FOR THE FACILITY?**

**Authority:** 30 CFR 250.1910(a)  
API RP 75 SECTION 2.1

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that management has developed and maintained a compilation of safety and environmental information that provides the basis for implementing succeeding program elements.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-201**

**DOES THE SEMS PROGRAM SAFETY AND ENVIRONMENTAL INFORMATION INCLUDE ALL API RP 75 PROGRAM ELEMENTS?**

**Authority:** 30 CFR 250.1910(b) (1)  
API RP 75 SECTION 2.1

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that management has developed and maintains the safety and environmental information for all of its facilities under BSEE jurisdiction.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-202**

**DOES THE MECHANICAL AND FACILITIES DESIGN INFORMATION INCLUDE AS APPROPRIATE THE P&ID DIAGRAM, ELECTRICAL AREA CLASSIFICATIONS, EQUIPMENT ARRANGEMENT DRAWINGS, DESIGN BASIS FOR THE RELIEF SYSTEM, DESCRIPTION FOR THE ALARM SYSTEM, DESCRIPTION OF THE SHUTDOWN SYSTEM, THE INTERLOCK SYSTEMS FOR FIRED EQUIPMENT, WELL CONTROL SYSTEMS, PASSIVE AND ACTIVE FIRE PROTECTION SYSTEM, EMERGENCY EVACUATION PROCEDURES, AND THE CATHODIC SYSTEM FOR CORROSION ISSUES?**

**Authority:** API RP 75 SECTION 2.3.1  
30 CFR 250.1916

**Enforcement Action:** W/C/S

**INSPECTION PROCEDURE:**

Verify that the SEMS program has been developed and maintained, and includes written procedures that provide instructions to ensure the mechanical integrity and safe operation of equipment through inspection, testing, and quality assurance.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

Issue one component shut-in (C) INC if a particular piece of process equipment does not have supporting documentation.

Issue a facility shut-in (S) INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **ENVIRONMENTAL**

- S-320**      **DOES THE SEMS PROGRAM ADDRESS ALL PHASES OF SEMS PROGRAM DEVELOPMENT INCLUDING: (1) SAFETY AND ENVIRONMENTAL POLICY, (2) PLANNING, (3) IMPLEMENTATION AND OPERATION, (4) VERIFICATION AND CORRECTIVE ACTION, (5) MANAGEMENT REVIEW, AND (6) CONTINUAL IMPROVEMENT?**  
**Authority:** 30 CFR 250. 1909      **Enforcement Action:** W  
                 **API RP 75 SECTION 1.1**  
**INSPECTION PROCEDURE:**  
Verify that the SEMS program addresses each phase of the SEMS program development.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has no program in place to establish each of the phases of their SEMS program.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-321**      **DOES THE SEMS PROGRAM ACHEIVE THE OPERATOR'S ESTABLISHED ENVIRONMENTAL GOALS AND PERFORMANCE MEASURES?**  
**Authority:** 30 CFR 250. 1910      **Enforcement Action:** W  
                 **API RP 75 SECTION 1.2**  
**INSPECTION PROCEDURE:**  
1. Verify that the SEMS program establishes environmental goals and performance measures.  
2. Verify that the SEMS program has achieved the established environmental goals and performance measures within the specified time frame.  
3. Verify documentation exists, as appropriate, and is up-to-date.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-322**      **HAS MANAGEMENT ENSURED THAT ESTABLISHED ENVIRONMENTAL GOALS AND PERFORMANCE MEASURES HAVE BEEN COMMUNICATED TO ALL PERSONNEL?**  
**Authority:** 30 CFR 250. 1909(e)      **Enforcement Action:** W  
                 **API RP 75 SECTION 1.2**  
**INSPECTION PROCEDURE:**  
1. Verify that the management has communicated the established environmental goals and performance measures to all personnel, as appropriate.  
2. Verify documentation exists, as appropriate, and is up-to-date.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-323**      **REGULARLY ASSIGNED PERSONNEL TRAINING, AS APPROPRIATE, IN ENVIRONMENTAL PROTECTION AND POLLUTION CONTROL?**  
**Authority:** API RP 75 SECTION 7      **Enforcement Action:** W  
                 **30 CFR 250.1915**  
**INSPECTION PROCEDURE:**  
1. Verify that the operator's SEMS Program has procedures in place for training all regularly assigned personnel in environmental protection and pollution control.  
2. Verify that the training has been conducted on a regular basis and extended to new personnel.  
3. To demonstrate compliance, verify that training documentation exists, as appropriate, and is up-to-date.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-324****DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS AS SET FORTH IN EXISTING REGULATIONS AND CLARIFYING NTLs THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?****Authority: 30 CFR 250. 1910****Enforcement Action: W****API RP 75 SECTION 1 AND 5.2****INSPECTION PROCEDURE:**

1. Verify that all requirements aimed at preventing environmental impacts as set forth in regulations and clarifying NTLs are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-325****IS THE SEMS PROGRAM IN COMPLIANCE WITH ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS AS SET FORTH IN EXISTING REGULATIONS AND CLARIFYING NTLs THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?****Authority: 30 CFR 250. 1910****Enforcement Action: W****API RP 75 SECTION 1 AND 5.2****INSPECTION PROCEDURE:**

1. Verify that compliance with all environmental requirements aimed at preventing environmental impacts as set forth in regulations and clarifying NTLs throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/issue one INC per SEMS program audited.

**S-326****DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS APPLIED THROUGH LEASE STIPULATIONS, MITIGATIONS, OR CONDITIONS OF APPROVAL THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?****Authority: 30 CFR 250. 1910****Enforcement Action: W****API RP 75 SECTION 1 AND 5.2****INSPECTION PROCEDURE:**

1. Verify that all environmental requirements aimed at preventing environmental impacts applied through lease stipulations, mitigations, or conditions of approval are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-327

**IS THE SEMS PROGRAM IN COMPLIANCE WITH ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS APPLIED THROUGH LEASE STIPULATIONS, MITIGATIONS, OR CONDITIONS OF APPROVAL THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?**

**Authority:** 30 CFR 250. 1910

**Enforcement Action:** W

**API RP 75 SECTION 1 AND 5.2**

**INSPECTION PROCEDURE:**

1. Verify compliance with all environmental requirements aimed at preventing environmental impacts applied through lease stipulations, mitigations, or conditions of approval are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement..
2. Verify documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-328

**DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING WATER QUALITY THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?**

**Authority:** 30 CFR 250. 1910

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Verify that all requirements regarding aimed at preventing environmental impacts to water quality are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-329

**DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING AIR QUALITY THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?**

**Authority:** 30 CFR 250. 1910

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Verify that all requirements regarding aimed at preventing environmental impacts to air quality are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-330

**DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING BIOLOGICAL RESOURCES INCLUDING PROTECTED SPECIES AND CHEMOSYNTHETIC AND BENTHIC COMMUNITIES THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?**

**Authority: 30 CFR 250.1910**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that all requirements regarding aimed at preventing environmental impacts to biological resources including protected species and chemosynthetic and benthic communities are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-331

**DOES THE SEMS PROGRAM ADDRESS ALL APPLICABLE ENVIRONMENTAL REQUIREMENTS REGARDING ARCHAEOLOGICAL AND CULTURAL RESOURCES THROUGHOUT ALL PHASES OF THE SEMS PROGRAM?**

**Authority: 30 CFR 250.1910**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that all requirements regarding aimed at preventing environmental impacts to archaeological and cultural resources are addressed throughout all phases of the operator's SEMS program including planning; implementation and operation; verification and corrective actions; management review; and continual improvement.
2. Verify that documentation exists to demonstrate compliance and performance, as appropriate, and is up-to-date.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee has not addressed appropriate environmental requirements in all phases of their SEMS program.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **HAZARDS ANALYSIS**

**S-400**

**DOES THE SEMS PROGRAM REQUIRE THAT A HAZARDS ANALYSIS BE PERFORMED FOR THE FACILITY IN ORDER TO IDENTIFY AND EVALUATE THE LIKLIHOOD AND CONSEQUENCES OF UNCONTROLLED RELEASES AND OTHER SAFETY OR ENVIRONMENTAL INCIDENTS?**

**Authority:** API RP 75 SECTION 3.1  
30 CFR 250.1911, 1911(a)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the management program requires that a hazards analysis be performed for any facility subject to this recommended practice and that human factors are considered in the analysis.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-401**

**HAVE HAZARDS ANALYSES (FACILITY LEVEL) BEEN PERFORMED FOR ALL TYPES OF OFFSHORE STRUCTURES PERMANENTLY OR TEMPORARILY ATTACHED TO THE SEABED ( I.E. MOBILE OFFSHORE DRILLING UNITS; FLOATING PRODUCTION SYSTEMS; FLOATING PRODUCTION, STORAGE AND OFFLOADING FACILITIES; TENSION-LEG PLATFORMS; SPARS; AND DOI REGULATED PIPELINES) USED FOR EXPLORATION, DEVELOPMENT, PRODUCTION, AND TRANSPORTATION ACTIVITIES FOR OIL, GAS, OR SULPHUR FROM AREAS LEASED IN THE OCS?**

**Authority:** API RP 75 SECTION 3.1  
30 CFR 250. 1911

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

Verify that the development and implementation of a hazards analysis has been conducted for each offshore facility.

**IF NONCOMPLIANCE EXISTS:**

Issue a facility shut-in (S) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-402**

**HAVE THE FINDINGS OF A CURRENT (INITIAL OR PERIODIC) HAZARDS ANALYSIS BEEN PRESENTED IN A WRITTEN REPORT THAT DESCRIBES THE HAZARDS IDENTIFIED AND THE RECOMMENDED MITIGATION ACTIONS?**

**Authority:** API RP 75 SECTION 3.6  
30 CFR 250.1911(a)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the lessee has identified the findings of a hazards analysis in a written report and that they have identified the recommended mitigating actions taken to correct the deficiency.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-403**

**HAVE JOB SAFETY ANALYSES (JSAs) BEEN DEVELOPED AND IMPLEMENTED FOR ALL OCS ACTIVITIES IDENTIFIED OR DISCUSSED IN THE SEMS PROGRAM?**

**Authority:** 30 CFR 250.1911(b)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the management program requires lessee to develop and implement a JSA for all OCS activities.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.



## **MANAGEMENT OF CHANGE**

**S-500**

**DOES THE SEMS PLAN ESTABLISH PROCEDURES FOR IDENTIFYING AND CONTROLLING HAZARDS ASSOCIATED WITH CHANGE AND MAINTAIN THE ACCURACY OF SAFETY INFORMATION?**

**Authority: API RP 75 SECTION 4.1**

**Enforcement Action: W**

**30 CFR 250.1912**

**INSPECTION PROCEDURE:**

Verify that the management program identifies the management of change procedures for modifications that may have the potential for disruption, injury, or business loss.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-501**

**DOES THE SEMS PROGRAM DEVELOP AND IMPLEMENT WRITTEN MANAGEMENT OF CHANGE (MOC) PROCEDURES FOR MODIFICATION OF EQUIPMENT CHANGES, INCLUDING MODIFICATIONS THAT RESULT IN CHANGES TO THE FACILITY OR EQUIPMENT DESIGN?**

**Authority: API RP 75 SECTION 4.2(f)**

**Enforcement Action: W**

**30 CFR 250.1912(a)(1)**

**INSPECTION PROCEDURE:**

Verify that the management program identifies the management of change procedure for equipment changes, including the addition of new equipment or modifications of existing equipment. These can include but is not limited to changes in alarms, instrumentation, and control schemes.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-502**

**DOES THE SEMS PROGRAM DEVELOP AND IMPLEMENT WRITTEN MANAGEMENT OF CHANGE (MOC) PROCEDURES FOR MODIFICATIONS OF THE OPERATING CONDITIONS OR PROCEDURES THAT INTRODUCE NEW HAZARDS OR COMPROMISE THE SAFEGUARDS BUILT INTO THE ORIGINAL DESIGN?**

**Authority: API RP 75 SECTION 4.2(e), (j)**

**Enforcement Action: W**

**30 CFR 250.1912(a)(2), (a)(5)**

**INSPECTION PROCEDURE:**

Verify that the management program identifies procedures to manage new operating conditions or new hazards introduced to the facility.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-503

**ARE EMPLOYEES, (INCLUDING CONTRACTORS), WHOSE JOB TASKS WILL BE AFFECTED BY A CHANGE, INFORMED OF THE CHANGE PRIOR TO STARTUP OF THE PROCESS OR AFFECTED PART OF THE OPERATION AND ARE THEY TRAINED IN, THE CHANGE PRIOR TO STARTUP OF THE PROCESS OR AFFECTED PART OF THE OPERATION?**

**Authority: 30 CFR 250 1912(e)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the management program has established procedures to communicate the proposed changes and consequences of those changes to appropriate personnel. For significant changes, training consistent with the guidance in Section 7 may be appropriate.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (**W**) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **OPERATING PROCEDURES**

**S-600**

**HAS MANAGEMENT DEVELOPED AND IMPLEMENTED WRITTEN OPERATING PROCEDURES THAT PROVIDE INSTRUCTIONS FOR CONDUCTING SAFE AND ENVIRONMENTALLY SOUND OPERATIONS AND DO THEY INCLUDE THE JOB TITLE AND REPORTING RELATIONSHIP OF THE PERSON OR PERSONS RESPONSIBLE FOR EACH OF THE FACILITY'S OPERATING AREAS?**

**Authority: API RP 75 SECTION 5.2**

**Enforcement Action: W**

**30 CFR 250.1913(a)**

**INSPECTION PROCEDURE:**

1. Verify that the management program includes requirements for written facility operating procedures designed to enhance efficient, safe, and environmentally sound operations.
2. Verify that the procedures address the following;
  - (a) Initial startup
  - (b) Normal operations
  - (c) All emergency operations
  - (d) Normal shutdown
  - (e) Start-up following a turnaround, or after an ESD
  - (f) Bypassing and flagging out-of-service equipment
  - (g) Operating outside of the equipment safety parameters
  - (h) MSDS information
  - (i) Chemical PPE
  - (j) Raw materials
  - (k) Control of hazardous materials in the workplace
  - (l) Hazards analysis of impacts to the human and marine environment
  - (m) Lease stipulations established by any governmental authority

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (**W**) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-601**

**IS THE FACILITY'S WRITTEN OPERATING PROCEDURES ACCESSIBLE TO ALL EMPLOYEES INVOLVED IN THE OPERATIONS?**

**Authority: API RP 75 SECTION 5**

**Enforcement Action: W**

**30 CFR 250.1913(b)**

**INSPECTION PROCEDURE:**

Verify that the operating procedures are accessible to all employees involved in the operations.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (**W**) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **SAFE WORK PRACTICES**

**S-700**

**DOES THE SEMS PROGRAM ESTABLISH AND IMPLEMENT SAFE WORK PRACTICES DESIGNED TO MINIMIZE THE RISKS ASSOCIATED WITH OPERATING, MAINTENANCE, AND MODIFICATION ACTIVITIES AND THE HANDLING OF MATERIALS AND SUBSTANCES THAT COULD AFFECT SAFETY OR THE ENVIRONMENT?**

**Authority: API RP 75 SECTION 6**

**Enforcement Action: W**

**30 CFR 250.1914**

**INSPECTION PROCEDURE:**

Verify that the management program includes practices that are designed to minimize the risks associated with operating, maintenance, and modification activities that apply to multiple locations and that they are in a written form (safety manual, safety standards, work rules, etc.).

NOTE: Contractors should have their own written safe work practices. Contractors may adopt appropriate sections of the operator's safety and environmental management program.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-702**

**DO THE SAFE WORK PRACTICES COVER, AS A MINIMUM, OPENING OF PRESSURIZED OR ENERGIZED EQUIPMENT AND PIPING, LOCKOUT AND TAGOUT OF ELECTRICAL AND MECHANICAL ENERGY SOURCES, HOT WORK AND OTHER WORK INVOLVING IGNITION SOURCES, CONFINED SPACE ENTRY AND CRANE OPERATIONS?**

**Authority: API RP 75 SECTION 6**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the management program provides as a minimum safe work practices that cover the above referenced activities.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-703**

**DOES THE SEMS PROGRAM DOCUMENT CONTRACTOR SELECTION CRITERIA?**

**Authority: API RP 75 SECTION 6**

**Enforcement Action: W**

**30 CFR 250.1914**

**INSPECTION PROCEDURE:**

Verify that when selecting contractors, operators should obtain and evaluate information regarding a contractor's safety and environmental management policies, practices, and past performance along with their procedures for selecting sub-contractors.

NOTE: API RP 76 is a useful reference for selecting contractors.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-704

**HAS THE OPERATOR COMMUNICATED THEIR SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM EXPECTATIONS AND SPECIFIC REQUIREMENTS TO CONTRACTORS AND HAS THE OPERATOR ENSURED CONTRACTORS HAVE THEIR OWN WRITTEN SAFE WORK PRACTICES?**

**Authority:** API RP 75 SECTION 6  
30 CFR 250.1914

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Verify that the contractors have received the operator's SEMS program expectations and that they have their own written safe work practices implemented before commencing work on the operators facilities
2. Verify that if a contractor adopts sections of the operator's SEMS program that they have documented their agreement on the appropriate contractor safety and environmental program.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-705

**HAS THE OPERATOR DOCUMENTED THAT CONTRACTED EMPLOYEES ARE KNOWLEDGEABLE AND EXPERIENCED IN THE WORK PRACTICES NECESSARY TO PERFORM THEIR JOB IN A SAFE AND ENVIRONMENTALLY SOUND MANNER?**

**Authority:** API RP 75 SECTION 6  
30 CFR 250.1914(b)

**Enforcement Action:** W/C

**INSPECTION PROCEDURE:**

Verify that the operators have documentation of each contracted employee's expertise to perform his/her job and that a copy of the contractor's safety policies is made available to the operator and BSEE upon request

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

Issue one component shut-in (C) INC for one or more employees that do not understand or cannot perform the assigned duties safely.

**Note:** The employee is the component.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-706

**DOES THE SEMS PROGRAM INCLUDE PROCEDURES AND VERIFICATION THAT CONTRACTORS HAVE THE SKILLS AND KNOWLEDGE TO PERFORM THEIR ASSIGNED DUTIES AND ARE CONDUCTING THESE ACTIVITIES IN ACCORDANCE WITH THE REQUIREMENTS IN THE OPERATOR'S SEMS PROGRAM?**

**Authority:** API RP 75 SECTION 6  
30 CFR 250.1914(c)

**Enforcement Action:** W/C

**INSPECTION PROCEDURE:**

1. Verify that the operators SEMS program include procedures and verification of the contractors ability to perform the required tasks and that they are conducting their activities in accordance with the operator's SEMS program.
2. Verify that the results of the operator's verification for selecting contractors are available upon request.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

Issue one component shut -in (C) INC for one or more employees that do not understand or cannot perform the assigned duties safely.

**Note:** The employee is the component.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-707

**DOES THE SEMS PROGRAM INCLUDE PROCEDURES AND VERIFICATION THAT CONTRACTOR PERSONNEL UNDERSTAND AND CAN PERFORM THEIR ASSIGNED DUTIES FOR ACTIVITIES SUCH AS, BUT NOT LIMITED TO INSTALLATION, MAINTENANCE, OR REPAIR OF EQUIPMENT, CONSTRUCTION, START-UP, AND OPERATION OF THE FACILITY, TURNAROUND OPERATIONS, MAJOR MODIFICATION, AND SPECIALTY WORK?**

**Authority:** API RP 75 SECTION 6  
30 CFR 250.1914(d)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the operators SEMS program includes procedures and verification that contract personnel understand and can perform as a minimum the above referenced activities.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

S-708

**DOES THE OPERATOR MAINTAIN A CONTRACTOR EMPLOYEE INJURY LOG FOR 2 YEARS RELATED TO THE CONTRACTOR'S WORK IN THE OPERATION AREA, AND IS THIS INFORMATION INCLUDED AND SUBMITTED ON FORM BSEE-0131?**

**Authority:** 30 CFR 250.1914(e) (2)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the operators maintain a contractor employee injury and illness log for a period of 2 years and that the log is available upon request.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited

S-709

**HAS THE OPERATOR INFORMED ITS CONTRACTORS OF ANY KNOWN HAZARDS AT THE FACILITY THEY ARE WORKING ON INCLUDING, BUT NOT LIMITED TO RISK OF FIRES, EXPLOSIONS, SLIPS, TRIPS, FALLS, OTHER INJURIES, AND THE HAZARDS ASSOCIATED WITH LIFTING OPERATIONS?**

**Authority:** API RP 75 SECTION 6  
30 CFR 250.1914(f)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the operators SEMS program addresses exchange of information concerning any known hazards to it contractors assigned to the facility.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **TRAINING**

- S-800**      **DOES THE SEMS PROGRAM ESTABLISH AND IMPLEMENT A TRAINING PROGRAM SO THAT ALL PERSONNEL ARE TRAINED TO WORK SAFELY AND ARE AWARE OF ENVIRONMENTAL CONSIDERATIONS OFFSHORE, IN ACCORDANCE WITH THEIR DUTIES AND RESPONSIBILITIES?**  
**Authority:** API RP 75 SECTION 7      **Enforcement Action:** W  
30 CFR 250.1915  
**INSPECTION PROCEDURE:**  
Verify that the operator's SEM program establishes a training program that prepares all personnel to safely work offshore.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-801**      **DOES THE OPERATORS SEMS TRAINING PROGRAM ADDRESS OPERATING PROCEDURES ALONG WITH SAFE WORK PRACTICES AND EMERGENCY RESPONSE AND CONTROL MEASURES?**  
**Authority:** API RP 75 SECTION 7      **Enforcement Action:** W  
30 CFR 250.1915  
**INSPECTION PROCEDURE:**  
Verify that the operators SEMS program addresses the operating procedures (250.1913), the safe work practices (250.1914) and the emergency response and control measures (250.1918).  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.
- S-802**      **DOES THE SEMS PROGRAM ADDRESS INITIAL TRAINING FOR THE BASIC WELL BEING OF PERSONNEL AND PROTECTION OF THE ENVIRONMENT, AND ENSURE THAT PERSONS ASSIGNED TO OPERATE AND MAINTAIN THE FACILITY POSSESS THE REQUIRED KNOWLEDGE AND SKILLS NECESSARY TO CARRY OUT THEIR DUTIES AND RESPONSIBILITIES, INCLUDING STARTUP AND SHUTDOWN?**  
**Authority:** API RP 75 SECTION 7.2      **Enforcement Action:** W  
30 CFR 250.1915 (a)  
**INSPECTION PROCEDURE:**  
Verify that the management program has established and implemented Initial training requirements so that all personnel work safely.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per SEMS program audited.

**ASSURANCE OF QUALITY AND MECHANICAL INTEGRITY OF  
CRITICAL EQUIPMENT**

**S-900**

**DOES THE SEMS PROGRAM DEVELOP AND IMPLEMENT WRITTEN PROCEDURES SO THAT CRITICAL EQUIPMENT FOR THE FACILITY IS DESIGNED, FABRICATED, INSTALLED, TESTED, INSPECTED, MONITORED AND BE MAINTAINED IN A MANNER CONSISTENT WITH APPROPRIATE SERVICE REQUIREMENTS, MANUFACTURER'S RECOMMENDATIONS, OR INDUSTRY STANDARDS AND DO CONTRACTORS HAVE PROGRAMS IN PLACE TO ADDRESS THEIR OWN CRITICAL EQUIPMENT?**

**Authority: API RP 75 SECTION 8.1**

**Enforcement Action: W/C/S**

**30 CFR 250.1916, 1916(a)**

**INSPECTION PROCEDURE:**

Verify that the management program establishes and implements written procedures that encompass all equipment and systems used to prevent or mitigate uncontrolled releases of hydrocarbons, toxic substances, or other materials that may cause environmental or safety consequences.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

Issue one component shut-in (C) INC for any piece of equipment or system that is not designed, fabricated, installed, tested, inspected, monitored, or maintained in a manner not consistent with appropriate service requirements.

Issue one facility shut-in (S) INC if the mechanical integrity of its critical equipment indicates that is not fit for service or poses a risk to safety, the facility, or the environment.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-901**

**DOES THE MECHANICAL INTEGRITY PROCEDURES ADDRESS THE FREQUENCY OF INSPECTIONS AND TESTS OF EQUIPMENT AND RELATED SYSTEMS?**

**Authority: API RP 75 SECTION 8**

**Enforcement Action: W**

**30 CFR 250.1916(c)**

**INSPECTION PROCEDURE:**

Verify that the management program requires testing and inspection procedures that follow commonly accepted standards and codes and that these procedures meet the manufacturer's recommendations.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-902**

**DOES THE MECHANICAL INTEGRITY PROCEDURES ADDRESS THE DOCUMENTATION OF EACH INSPECTION AND TEST THAT HAS BEEN PERFORMED ON EQUIPMENT AND SYSTEMS?**

**Authority: API RP 75 SECTION 8**

**Enforcement Action: W**

**30 CFR 250.1916(d)**

**INSPECTION PROCEDURE:**

Verify that the management program has procedures that document the date of the inspection, name and position of person who performed the inspection or test and also a description of and results of the inspection or test.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.



**S-903**

**DOES THE MECHANICAL INTEGRITY PROCEDURES ADDRESS THE CORRECTION OF DEFICIENCIES ASSOCIATED WITH EQUIPMENT AND SYSTEMS THAT ARE OUTSIDE THE MANUFACTURER'S RECOMMENDED LIMITS AND ARE CORRECTIONS MADE BEFORE FURTHER USE OF THE EQUIPMENT OR SYSTEMS?**

**Authority:** API RP 75 SECTION 8

**Enforcement Action:** W

**30 CFR 250.1916(e)**

**INSPECTION PROCEDURE:**

Verify that the management program has procedures that document the corrections before the equipment and systems are put back in service.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-904**

**DOES THE TESTING, INSPECTION, CALIBRATION AND MONITORING PROGRAMS FOR CRITICAL EQUIPMENT INCLUDE THE FOLLOWING ITEMS?**

- 1. LIST OF CRITICAL EQUIPMENT AND SYSTEMS THAT ARE SUBJECT TO INSPECTING AND TESTING?**
- 2. DOES THE LIST SPECIFY THE METHOD AND INTERVAL OF TESTING AND INSPECTING, ACCEPTABLE LIMITS, AND CRITERIA FOR PASSING THE TEST OR INSPECTION?**
- 3. DO THE TESTING AND INSPECTION PROCEDURES FOLLOW COMMONLY ACCEPTED STANDARDS AND CODES?**
- 4. IS THERE DOCUMENTATION OF THE TESTING AND INSPECTIONS?**
- 5. IS PRESSURE VESSEL TESTING AND INSPECTION DOCUMENTATION RETAINED FOR THE LIFE OF THE EQUIPMENT?**
- 6. IS ALL OTHER DOCUMENTATION RETAINED FOR A MINIMUM OF 2 YEARS OR AS NEEDED TO DETERMINE ANY CHANGES THAT MAY BE NEEDED IN FREQUENCY OF TESTING, INSPECTION, AND PREVENTIVE MAINTENANCE, OR AS REQUIRED BY REGULATORY AGENCIES OR FOR THE PREPARATION OR REVISION OF THE HAZARD ANALYSIS?**
- 7. ARE THERE PROCEDURES TO DOCUMENT AND CORRECT CRITICAL EQUIPMENT DEFICIENCIES OF OPERATIONS THAT ARE OUTSIDE ACCEPTABLE LIMITS?**
- 8. IS THERE A SYSTEM FOR REVIEWING AND AUTHORIZING CHANGES IN TESTS AND INSPECTIONS?**
- 9. DO THE TESTING, INSPECTION AND MONITORING PROGRAMS INCLUDE APPROPRIATE AUDITING PROCEDURES TO ENSURE COMPLIANCE WITH THE PROGRAM?**

**Authority:** API RP 75 SECTION 8.6

**Enforcement Action:** W

**30 CFR 250.1916**

**INSPECTION PROCEDURE:**

Verify that the management program establishes and implements testing and inspection procedures addressing the above referenced topics as applicable for their offshore facilities.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **PRE-STARTUP REVIEW**

**S-1000**

**DOES THE SEMS PROGRAM REQUIRE THAT THE COMMISSIONING PROCESS INCLUDE A PRE-STARTUP SAFETY AND ENVIRONMENTAL REVIEW FOR NEW AND SIGNIFICANTLY MODIFIED FACILITIES TO CONFIRM THAT THE FOLLOWING CRITERIA ARE MET?**

- 1. CONSTRUCTION TECHNIQUES AND EQUIPMENT SELECTION ARE IN ACCORDANCE WITH APPLICABLE SPECIFICATIONS?**
- 2. SAFETY, ENVIRONMENTAL, OPERATING, MAINTENANCE, AND EMERGENCY PROCEDURES ARE IN PLACE AND ARE ADEQUATE?**
- 3. SAFETY AND ENVIRONMENTAL INFORMATION IS CURRENT?**
- 4. HAZARDS ANALYSIS RECOMMENDATIONS HAVE BEEN IMPEMENTED AS APPROPRIATE?**
- 5. A SAFETY ANALYSIS PERFORMED TO IDENTIFY UNDESIRABLE EVENTS THAT MIGHT POSE A THREAT TO SAFETY (API 14C 3.1)**
- 6. TRAINING OF OPERATING PERSONNEL HAS BEEN COMPLETED?**
- 7. PROGRAMS TO ADDRESS MANAGEMENT OF CHANGE AND OTHER ELEMENTS OF API RP 75 AND SUBPART S ARE IN PLACE?**
- 8. SAFE WORK PRACTICES ARE IN PLACE?**

**Authority: API RP 75 SECTION 9  
30 CFR 250.1917**

**Enforcement Action: W/C**

**INSPECTION PROCEDURE:**

Verify that the SEMS program requires that the commissioning process includes the above criteria for new and significantly modified facilities.

**IF NONCOMPLIANCE EXISTS:**

1. Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.
2. Issue one component shut -in (C) INC for any piece of new or modified equipment or system that is not designed, fabricated, or installed in a manner consistent with the application for which they will be used or is not consistent to the above criteria.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **EMERGENCY RESPONSE AND CONTROL**

**S-1100**

**DOES THE SEMS PROGRAM REQUIRE THAT THE EMERGENCY RESPONSE AND CONTROL PLANS BE IN PLACE AND READY FOR IMMEDIATE IMPLEMENTATION?**

**Authority: API RP 75 SECTION 10**

**Enforcement Action: W**

**30 CFR 250.1918**

**INSPECTION PROCEDURE:**

Verify that the SEMS program requires that emergency response and control plans are in place and are ready for immediate implementation.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1101**

**ARE WRITTEN ACTION PLANS ESTABLISHED TO ASSIGN AUTHORITY TO THE APPROPRIATELY QUALIFIED PERSON(S) FOR INITIATING EFFECTIVE EMERGENCY RESPONSE AND CONTROL?**

**Authority: API RP 75 SECTION 10.2**

**Enforcement Action: W**

**30 CFR 250.1918 (a)**

**INSPECTION PROCEDURE:**

Verify that the SEMS program requires a written action plan at the facility for initiating effective emergency response and control.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **INVESTIGATION OF INCIDENTS**

**S-1200**

**DOES THE SEMS PROGRAM ESTABLISH PROCEDURES FOR INVESTIGATION OF ALL INCIDENTS WITH SERIOUS SAFETY OR ENVIRONMENTAL CONSEQUENCES?**

**Authority: API RP 75 SECTION 11.1  
30 CFR 250.1919**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the SEMS program establishes procedures for investigation of all incidents with serious safety or environmental consequences.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1201**

**DOES THE SEMS PROGRAM REQUIRE INVESTIGATION OF INCIDENTS THAT ARE DETERMINED BY FACILITY MANAGEMENT OR BSEE TO HAVE POSSESSED THE POTENTIAL FOR SERIOUS SAFETY OR ENVIRONMENTAL CONSEQUENCES?**

**Authority: API RP 75 SECTION 11.1  
30 CFR 250.1919**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the SEMS program establishes procedures for investigation of all incidents with serious safety or environmental consequences identified by the management or as directed by the BSEE.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1202**

**DOES THE CORRECTIVE ACTION PROGRAM:**

- 1. RETAIN THE FINDINGS OF INVESTIGATIONS FOR USE IN THE NEXT HAZARD ANALYSIS UPDATE OR AUDIT, AND ARE THE FINDINGS RETAINED FOR A MINIMUM OF 2 YEARS, WHICHEVER IS GREATER?**
- 2. DETERMINE AND DOCUMENT THE RESPONSE TO EACH FINDING TO ENSURE THOSE CORRECTIVE ACTIONS ARE COMPLETED IN A TIMELY MANNER?**
- 3. IMPLEMENT A SYSTEM WHERE BY CONCLUSIONS OF INVESTIGATIONS ARE DISTRIBUTED TO SIMILAR FACILITIES AND APPROPRIATE PERSONNEL WITHIN THEIR ORGANIZATION?**

**Authority: API RP 75 SECTION 11.3  
30 CFR 250.1919 (b)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the operator has implemented a system whereby conclusions of investigations are communicated within their organization and that corrective actions are completed in a timely manner.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **AUDIT OF SEMS ELEMENTS**

**S-1300**

**DOES THE SEMS PROGRAM REQUIRE AN AUDIT BY AN INDEPENDENT THIRD-PARTY OR DESIGNATED AND QUALIFIED PERSONNEL ACCORDING TO THE REQUIREMENTS OF 30 CFR 250 SUBPART S AND API RP 75, SECTION 12 WITHIN TWO YEARS OF THE INITIAL IMPLEMENTATION OF THE SEMS PROGRAM AND AT LEAST ONCE EVERY THREE YEARS THEREAFTER?**

**Authority: API RP 75 SECTION 12  
30 CFR 250.1920(a)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the operator has procedures in place to have their program audited as per the above noted regulations.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1301**

**DOES THE AUDIT COVERAGE PROVIDE FOR:**

- 1. A TESTING SYSTEM BASED ON INTERVIEWS AND INSPECTIONS CONDUCTED AT FIELDS THAT DIFFER SIGNIFICANTLY (E.G., OIL VS. DRY GAS), RATHER THAN AT EACH FACILITY.**
- 2. ASSESSMENT OF A SUFFICIENT NUMBER OF FACILITIES TO EVALUATE MANAGEMENT'S COMMITMENT TO API RP 75 SECTION 12.2 (a), (b), and (c)?**
- 3. AUDIT OF AT LEAST FIFTEEN PERCENT (15%) OF THE FACILITIES OPERATED, WITH A MINIMUM OF ONE FACILITY, BEING AUDITED?**
- 4. EXCLUSION OF FACILITIES INCLUDED IN THE PREVIOUS AUDIT?**
- 5. EXPANSION OF THE SAMPLE TEST SIZE WHEN SUFFICIENT DEFICIENCIES WERE IDENTIFIED IN THE EFFECTIVENESS OF ANY SEMS ELEMENT?**

**Authority: API RP 75 SECTION 12  
30 CFR 250.1920(a)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the audit coverage adheres to 1 thru 5 above.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1302**

**DOES THE AUDIT PROGRAM PROVIDE FOR AN EVALUATION OF COMPLIANCE WITH ALL THIRTEEN ELEMENTS (INCLUDING JSAS) THAT ARE REQUIRED IN THE SEMS PROGRAM, AND ALSO IDENTIFIES AREAS WHERE SAFETY AND ENVIRONMENTAL PERFORMANCE NEEDS TO BE IMPROVED UPON?**

**Authority: API RP 75 SECTION 12  
30 CFR 250.1920(a)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that the audit program covers all thirteen elements and identifies areas where improvement could be improved upon.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1303**                    **WAS THE WRITTEN AUDIT PLAN SUBMITTED TO BSEE AT LEAST 30 DAYS BEFORE THE AUDIT AND THE FACILITY LISTING REVISED IF REQUIRED BY BSEE?**  
**Authority:** API RP 75 SECTION 12                    **Enforcement Action:** W  
   **30 CFR 250.1920(b)**

**INSPECTION PROCEDURE:**

Verify by receipt that the audit plan was submitted 30 days prior to the audit.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1304**                    **DID THE AUDITOR (INDEPENDENT THIRD PARTY OR DESIGNATED AND QUALIFIED PERSONNEL) SUBMIT A COPY OF THEIR PLAN FOR ADDRESSING THE DEFICIENCIES IDENTIFIED IN THEIR AUDIT TO BSEE WITHIN 30 DAYS OF THE COMPLETION DATE AND WERE THE FOLLOWING ITEMS ADDRESSED?**

**1. A PROPOSED SCHEDULE TO CORRECT THE DEFICIENCIES IDENTIFIED IN THE AUDIT.**

**2. THE PERSON(S) RESPONSIBLE FOR CORRECTING EACH IDENTIFIED DEFICIENCY, INCLUDING THEIR JOB TITLE.**

**Authority:** API RP 75 SECTION 12                    **Enforcement Action:** W  
   **30 CFR 250.1920(d)**

**INSPECTION PROCEDURE:**

Verify that the findings and conclusions of the audit were provided to BSEE within the specified timeframe and that the report address's the time frame for the deficiencies to be corrected and that the name of the person(s) responsible for the corrections are identified including their job title.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1305**                    **DOES THE SEMS PROGRAM HAVE PROCEDURES TO AVOID CONFLICTS OF INTEREST RELATED TO THE DEVELOPMENT OF YOUR SEMS PROGRAM AND THE INDEPENDENT THIRD PARTY AUDITOR AND YOUR DESIGNATED AND QUALIFIED PERSONNEL?**

**Authority:** API RP 75 SECTION 12                    **Enforcement Action:** W  
   **30 CFR 250.1926 (b)**

**INSPECTION PROCEDURE:**

Verify that the SEMS program takes into account the above statement.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

## **RECORDS AND DOCUMENTATION**

**S-1400**

**DOES THE SEMS PROGRAM HAVE PROCEDURES THAT ENSURE THAT RECORDS AND DOCUMENTS ARE MAINTAINED FOR A PERIOD OF SIX (6) YEARS EXCEPT FOR JSA'S, INJURY/ILLNESS LOGS, EVALUATIONS COMPLETED ON YOUR CONTRACTORS SAFETY POLICIES, AND YOUR DOCUMENTATION OF MANAGEMENT AND CHANGE PROVISIONS?**

**Authority: API RP 75 SECTION 13**

**Enforcement Action: W**

**30 CFR 250.1928 (a)**

**INSPECTION PROCEDURE:**

1. Verify that the SEMS program has procedures in place to address records and documentation.
2. Verify that copies of the documents are maintained at an offshore location.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1401**

**DOES THE SEMS PROGRAM HAVE PROCEDURES FOR JSA'S TO BE KEPT ONSITE FOR A MINIMUM OF 30 DAYS AND THAT THESE RECORDS ARE TO BE RETAINED FOR A MINIMUM OF 2 YEARS.**

**Authority: API RP 75 SECTION 13**

**Enforcement Action: W**

**30 CFR 250.1928 (b)**

**INSPECTION PROCEDURE:**

1. Verify that the SEMS program has procedures for JSAS to be maintained as required by this subpart 30 CFR 250.1928(b).
2. Verify that these records are available to BSEE upon request.
3. Verify that they are retained for a minimum of 2 years.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1402**

**DOES THE SEMS PROGRAM HAVE PROCEDURES FOR DOCUMENTING ALL MANAGEMENT OF CHANGE (MOC) PROVISIONS AS SPECIFIED IN 30 CFR 250.1912 AND THAT THESE RECORDS ARE RETAINED FOR A MINIMUM OF 2 YEARS?**

**Authority: API RP 75 SECTION 13**

**Enforcement Action: W**

**30 CFR 250.1928 (c)**

**INSPECTION PROCEDURE:**

1. Verify that the SEMS program has procedures for documenting all Management of Change provisions as required by this subpart 30 CFR 250.1928 (c).
2. Verify that these records are available to BSEE upon request.
3. Verify that they are retained for a minimum of 2 years.

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1403**

**DOES THE SEMS PROGRAM HAVE PROCEDURES FOR MAINTAINING THE INJURY/ILLNESS LOG FOR 2 YEARS.**

**Authority: API RP 75 SECTION 13  
30 CFR 250.1928 (d)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that the SEMS program has procedures for documenting and maintaining an injury/illness log.
2. Verify that these records are available to BSEE upon request.
3. Verify that they are retained for a minimum of 2 years

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.

**S-1404**

**DOES THE SEMS PROGRAM HAVE PROCEDURES FOR MAINTAINING ALL EVALUATIONS COMPLETED ON THEIR CONTRACTOR'S SAFETY POLICIES AND PROCEDURES FOR 2 YEARS?**

**Authority: API RP 75 SECTION 13  
30 CFR 250.1928 (e)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that the SEMS program has procedures for documenting and maintaining all evaluations completed on their contractor's safety policies and procedures.
2. Verify that these records are available to BSEE upon request.
3. Verify that they are retained for a minimum of 2 years

**IF NON COMPLIANCE EXISTS:**

Issue one warning (W) INC if during an audit of the operator's SEMS program the lessee does not provide the necessary documentation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per SEMS program audited.